

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

**JESSICA MOORE**  
**Plaintiff,**

**VS.**

**KINSHIP PLACE, LLC ET AL**  
**Defendant.**

**Case Number : 4:24-cv-01036-O**

## **DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME**

COME NOW, Kinship Place, LLC (“Kinship”) (the “Defendant”), and files this Unopposed Motion for Extension of Time to file its Response to Plaintiff’s Original Complaint and states as follows:

## A. INTRODUCTION

1. Plaintiff filed its Original Complaint on October 25, 2024. ECF No. 1.
2. Defendants on October 28, 2024, filed a waiver of service of summons. ECF No. 4.

The deadline for Defendants to answer or otherwise respond to Plaintiff's Original Complaint is on or before December 24, 2024.

## B. ISSUE BEFORE THE COURT

4. Defendants now seek a 21-day extension of the response deadline to be up to and including the following: **January 14, 2024**.
5. This is Plaintiff's first request for an extension of time.
6. Defendants have conferred with Plaintiff's counsel, Mr. Douglas B. Welmaker, regarding the extension above, and Plaintiff is unopposed to the extension provided.

### **C. ARGUMENT**

7. Under F.R.C.P. 6(b), a court may, for good cause, extend the time period for a party to act if a request is made before the original time period to response expires.

8. Here, Defendant needs to the additional time to review and evaluate each of the allegations contained in Plaintiff's Original Complaint and determine the appropriate response for each allegation. This review has taken longer than Defendants initially anticipated and as such, additional time is needed.

9. This request for extension of time is not merely for delay, but so that justice may be done. It is Defendants' belief that Plaintiff will not be harmed by the extension as Plaintiff is unopposed.

### **D. CONCLUSION**

10. Defendant's respectfully asks the Court to grant the requested extension for Defendant's to respond to Plaintiff Original Complaint to January 14, 2024.

Respectfully submitted,

KENNEDY  
Attorneys & Counselors at Law

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**ATTORNEYS FOR DEFENDANT'S**

**CERTIFICATE OF CONFERENCE**

I hereby certify that on December 19<sup>th</sup>, 2024, our office conferred as to this motion for extension of time with Counsel for Plaintiff, by way of an exchange of electronic mail. Plaintiff has replied and stated it is unopposed.

/s/ C. Trey Scott  
C. TREY SCOTT

**CERTIFICATE OF SERVICE**

I hereby certify that on December 20<sup>th</sup>, 2024, a copy of this motion was served on all counsel of record through the CM/ECF system, which automatically issued a Notice of Electronic Filing on the attorneys of record for Plaintiff.

/s/ C. Trey Scott  
C. TREY SCOTT